

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRETT T. CULVER,  
Plaintiff

v.

COMMONWEALTH OF PENNSYLVANIA,  
et al.,  
Defendants

AFFIDAVIT

CIVIL NO. 1:-cv-01-00904

(Judge Kane)

**FILED**  
HARRISBURG, PA

OCT 15 2001

MARY E. MANOREA, CLERK  
Per 9/8 Deputy Clerk

On the date of October 9, 2001 this plaintiff was again accosted by the defendant T.E. Miknich. This plaintiff was assigned to program education classes at the Progressive Services Building within the facility of SCI Mahanoy where this plaintiff is presently incarcerated, and where the defendant T.E. Miknich is stationed in the employ of the SCI Mahanoy facility. At approximately 9:15 AM this plaintiff was in the Progressive Services Building in route to the assigned classroom. When this plaintiff seen the defendant in the hall area I tried to avoid contact by heading back to the front desk area where another officer was stationed. At that time the defendant T.E. Miknich seen this plaintiff and started yelling and chasing after my person. Defendant was yelling and calling this plaintiff a jerk. When this plaintiff approached the lobby door to the front desk area the defendant T.E. Miknich threatened this plaintiff not to go through the door. At this time the defendant T.E. Miknich got in my face and proceeded to harass my person. Defendant T.E. Miknich attempted to provoke and instigate an altercation with this plaintiff by humiliating and harassing my person.

Plaintiff has suffered, and continues to suffer ongoing abuses, harassments, and threats by the defendant T.E. Miknich, and is subjected to these abuses every time this plaintiff is exposed or comes in contact with the offending defendant T.E. Miknich. The SCI Mahanoy Administrative officials "have and "continue to deny this plaintiff relief or protection from the abuses and adverse treatments by its staff members.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 9 day of October, 2001

Signature, T. T. Culver